

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	
	:	CRIMINAL NO. _____
v.	:	
	:	DATE FILED: _____
KEITH ANTONIO WARREN	:	
TYRELL WARREN	:	VIOLATIONS:
CHRISTOPHER BRYANT	:	18 U.S.C. § 371 (conspiracy to commit
	:	armed bank robbery - 1 count)
	:	18 U.S.C. § 2113(d) (attempted armed bank
	:	robbery - 1 count)
	:	18 U.S.C. § 924(c) (using and carrying a
	:	firearm during and in relation to a crime of
	:	violence - 1 count)
	:	18 U.S.C. § 922(g)(1) (convicted felon in
	:	possession of a firearm - 1 count)
	:	18 U.S.C. § 2 (aiding and abetting)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. On or about December 6, 2006, in Philadelphia, Pennsylvania, in the Eastern District of Pennsylvania, defendants

**KEITH ANTONIO WARREN,
TYRELL WARREN,
and
CHRISTOPHER BRYANT**

conspired and agreed together to commit an offense against the United States, that is, to knowingly and unlawfully commit armed bank robbery of the M&T Bank, in Philadelphia, Pennsylvania (hereafter “the bank”), the deposits of which were insured by the Federal Deposit Insurance Corporation, in violation of Title 18, United States Code, Section 2113(d).

MANNER AND MEANS

2. It was part of the conspiracy that defendants KEITH ANTONIO WARREN, TYRELL WARREN, and CHRISTOPHER BRYANT attempted to commit an armed robbery of the M&T Bank located at 7121 Frankford Avenue, Philadelphia, Pennsylvania.

OVERT ACTS

In furtherance of the conspiracy, the defendants committed the following overt acts in the Eastern District of Pennsylvania:

On or about December 6, 2006:

1. Defendants KEITH ANTONIO WARREN, TYRELL WARREN, CHRISTOPHER BRYANT discussed their plan to rob the M&T Bank, located at 7121 Frankford Avenue, Philadelphia, Pennsylvania.

2. Defendants KEITH ANTONIO WARREN, TYRELL WARREN, CHRISTOPHER BRYANT drove together to the M&T Bank, for the purpose of committing an armed bank robbery.

3. Defendants KEITH ANTONIO WARREN and CHRISTOPHER BRYANT entered the M&T Bank, while defendant TYRELL WARREN waited outside in a get-away vehicle.

4. Defendant KEITH ANTONIO WARREN brandished a black semi-automatic pistol and ordered employees and customers to lay on the floor, as defendant CHRISTOPHER BRYANT stood guard at the entrance to the bank.

5. Defendant KEITH ANTONIO WARREN attempted to gain access to the bank's vault. After failing to get into the vault, defendants KEITH ANTONIO WARREN and CHRISTOPHER BRYANT fled from the bank.

6. Defendant KEITH ANTONIO WARREN entered the vehicle driven by defendant TYRELL WARREN and together they fled the area. Defendant CHRISTOPHER BRYANT separately fled the area on foot.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 6, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**KEITH ANTONIO WARREN,
TYRELL WARREN,
and
CHRISTOPHER BRYANT**

knowingly and unlawfully by force and violence, and by intimidation, attempted to take, and aided and abetted the attempt to take, from employees of the M&T Bank, lawful currency of the United States, belonging to, and in the care, custody, control, management and possession of the M&T Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation, and, in so doing, defendants KEITH ANTONIO WARREN, TYRELL WARREN, and CHRISTOPHER BRYANT knowingly and unlawfully assaulted and put in jeopardy the lives of the employees of the M&T Bank, and other persons, by use of a dangerous weapon, that is, a black Smith & Wesson .380 caliber semiautomatic pistol, serial number RAB6330, loaded with five live rounds of ammunition.

In violation of Title 18, United States Code, Sections 2113(d) and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 6, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**KEITH ANTONIO WARREN,
TYRELL WARREN,
and
CHRISTOPHER BRYANT**

knowingly carried and used, and aided and abetted the carrying and use of, a firearm, that is, a black Smith & Wesson .380 caliber semiautomatic pistol, serial number RAB6330, loaded with five live rounds of ammunition, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, attempted armed bank robbery, in violation of Title 18, United States Code, Section 2113(d).

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 6, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendant

KEITH ANTONIO WARREN,

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, that is, a black Smith & Wesson .380 caliber semiautomatic pistol, serial number RAB6330, loaded with five live rounds of ammunition.

In violation of Title 18, United States Code, Sections 922(g)(1), 924(e).

A TRUE BILL:

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
United States Attorney